STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT

IN THE MATTER OF: LEROY J. WRIGHT and
WRIGHT CAPITAL PARTNERS, LLC) 0800485
his partners, officers and directors,
managers, agents, employees,
affiliates, successors and assigns.

TEMPORARY ORDER OF PROHIBITION

TO RESPONDENTS: LEROY J. WRIGHT

31 WEST 13TH STREET

CHICAGO, ILLINOIS 60605

and

WRIGHT CAPITAL PARTNERS, LLC.

230 WEST MONROE STREET

SUITE 2221

CHICAGO, ILLINOIS 60606

On information and belief, I, Jesse White, Secretary of State for the State of Illinois, through my designated representative, who has been fully advised in the premises by the staff of the Securities Department, Office of the Secretary of State, herein find:

- 1. Leroy J. Wright (at times hereinafter "LJW" or together with Wright Capital Partners, LLC. "Respondents") has a last known address of 31 West 13th Street, Chicago, Illinois 60605.
- 2. Wright Capital Partners, LLC (at times hereinafter "Wright LLC" or together with Leroy J. Wright "Respondents") was an Illinois limited liability company, dissolved in 2008, with a last known address of 230 West Monroe St., Suite 2221, Chicago, Illinois 60606.
- 3. At all relevant times herein Respondent Leroy J. Wright was the sole controlling member/partner and agent of Wright Capital Partners, LLC.
- 4. In August 2005 LJW solicited at least one Illinois resident ("Investor") to pay \$10,000 for the purchase of "convertible preferred stock" (which was to be used for "general working capital purposes") in Respondent Wright, LLC.

- 5. On August 26, 2005 Investor paid Respondents \$10,000 which Investor believed would be used to purchase stock.
- 6. Respondents promised to make quarterly "interest" or "dividend" payments based on 15% per annum of the investment.
- 7. Respondent's activities described above involve the offer and sale of a note or an investment contract as those terms are defined in Sections 2.1, 2.5 and 2.5a of the Illinois Securities Law of 1953 [815 ILCS 5] (the "Act").

FAILURE TO REGISTER SECURITIES

- 9. Section 5 of the Act provides, *inter alia*, that "all securities except those set forth under Section 2a of this Act...or those exempt...shall be registered...prior to their offer or sale in this State.
- 10. Respondents failed to file an application with the Secretary of State to register the investment contract as required by the Act, and as a result the investment contract was not registered as such prior to their or sale in the State of Illinois.
- 11. Section 12.A of the Act provides, *inter alia*, that it shall be a violation of the Act to offer or sell any security except in accordance with the provisions of the Act.
- 12. Section 12.D of the Act provides, *inter alia*, that it shall be a violation of the Act to fail to file with the Secretary of State any application, report or document required to be filed under the provisions of this Act or any rule or regulation made by the Secretary of State pursuant to the Act or to fail to comply with the terms of any order of the Secretary of State issued pursuant to Section 11 hereof.
- 13. By virtue of the foregoing, Respondents violated Sections 12.A and 12.D of the Act.

FRAUD AND DECEIT

- 14. To date the Respondents have made only two quarterly payments of \$750 to the Investor, and the Investor has received no payment since 2006.
- 15. In spite of numerous attempts, the Investor has been unable to contact the Respondents, and the whereabouts of the Respondents are unknown to Investor.
- 16. Respondents told the Investor they would pay interest or dividends at the rate of 15% per annum, but all the while Respondents were converting the funds to their own use and benefit.
- 17. Respondents, instead of making the payments as promised, converted the principal received from the Investor to Respondents' own use and benefit.

- 18. Respondents, at the time of the agreement, failed and refused to notify the Investor that the principal would be converted to their own benefit rather than used to generate interest for the Investor's benefit.
- 19. Respondents knew, or should have known, that a limited liability company is not a corporation and therefore cannot issue shares of stock.
- 20. Section 12.F of the Act provides, *inter alia*, that it shall be a violation of the Act for any person, "to engage in any transaction, practice or course of business in connection with the sale or purchase of securities which works or tends to work a fraud or deceit upon the purchaser or seller thereof".
- 21. Section 12.G of the Act provides, *inter alia*, that it shall be a violation of the Act for any person to obtain money or property through the sale of securities by means of any untrue statement of a material fact or any omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading.
- 22. Section 12.I of the Act provides, *inter alia*, that it shall be a violation of the Act for any person, "to employ any device, scheme or artifice to defraud in connection with the sale or purchase of any security, directly or indirectly".
- 23. By virtue of the foregoing, Respondents violated Sections 12.F, 12.G and 12.I of the Act.
- 24. Section 11.F(2) of the Illinois Securities Law of 1953, 815 ILCS 5/1 et seq., ("the Act") provides, inter alia, that the Secretary of State may temporarily prohibit or suspend for a maximum period of 90 days, by an order effective immediately, the offer or sale of securities by any person, if the Secretary of State shall in his or her opinion, based on credible evidence, deem it necessary to prevent an imminent violation of this Act or to prevent losses to investors which the Secretary of State reasonably believes will occur as a result of a prior violation of this Act.

NOW THEREFORE IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 11.F of the Act, Respondents Leroy J. Wright and Wright Capital Partners, LLC and their partners, officers and directors, agents, employees, affiliates, successors and assigns are temporarily PROHIBITED from offering or selling securities in or from this State until the further Order of the Secretary of State.

NOTICE is hereby given that Respondents may request a hearing on this matter by transmitting such request in writing to the Director, Illinois Securities Department, 69 W. Washington Street, Suite 1220, Chicago, Illinois 60602. Such request must be made within thirty (30) calendar days of the date of entry of the Temporary Order of Prohibition. Upon receipt of a request for hearing, a hearing will be scheduled as soon as reasonably practicable. A request for hearing will not stop the effectiveness of this Temporary Order and will extend the

Temporary Order of Prohibition

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effectiveness of this Temporary Order for sixty days from the date the hearing request is received by the Department.

FAILURE BY ANY RESPONDENT TO REQUEST A HEARING WITHIN THIRTY (30) CALENDAR DAYS AFTER ENTRY OF THIS TEMPORARY ORDER OF PROHIBITION SHALL CONSTITUTE AN ADMISSION OF ANY FACTS ALLEGED HEREIN AND SHALL CONSTITUTE SUFFICIENT BASIS TO MAKE THIS TEMPORARY ORDER OF PROHIBITION FINAL.

Dated: This _______ day of February 2010.

JESSE WHITE Secretary of State State of Illinois

James J. Tierney
Enforcement Attorney
Office of the Secretary of State
Illinois Securities Department
69 W. Washington, Suite 1220
Chicago, Illinois 60602
Telephone: (312) 793-9650